

**LAW OFFICES OF YONI WEINBERG, P.C.**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PSARA ENERGY, LTD.,

Plaintiff,

v.

SPACE SHIPPING LTD., GEDEN  
HOLDINGS LTD.; ADVANTAGE  
SPRING SHIPPING, LLC; GENEL  
DENIZCILIK NAKLIYATI A.S. A/K/A  
GEDEN LINES; ADVANTAGE  
TANKERS, LLC; MEHMET EMIN  
KARAMEHMET; GULSUN NAZLI  
KARAMEHMET-WILLIAMS; TUGRUL  
TOKGOZ; MEHMET MAT;  
FLEETSCAPE SPRING, LLC;  
FLEETSCAPE ADVANTAGE  
HOLDINGS, LLC;

Defendants.

Case No.

**DECLARATION OF GEORGE A. GAITAS  
AUTHENTICATING EXHIBITS 1-13**

I, George A. Gaitas, pursuant to Section 1746 of Title 28 United States Code, hereby declare and state the following under the penalty of perjury:

A. I am an individual of sound mind and have never been convicted of a crime of moral turpitude.

B. I am an attorney at law with the law firm of Gaitas & Chalos, P.C. and I represent the Plaintiff ECLIPSE LIQUIDITY, INC, (hereinafter "Plaintiff") in the above-captioned matter.

1 B. I am making this declaration in support of Plaintiff's Verified Complaint in the  
2 above captioned action.

3 C. The purpose of my declaration is to authenticate documents which are attached  
4 hereto as exhibits and which will be referred to in Plaintiff's Verified Complaint. All of the  
5 documents attached are genuine copies of original documents in my possession, documents from  
6 public records, or from publications available and obtainable by the public at large. The documents  
7 hereunder authenticated are the following:  
8

9 1) Attached hereto and marked as EXHIBIT 1 is a charter party dated Feb. 23, 2010  
10 between Psara Energy Limited as owner and Geden Holdings Limited or nominee;

11 2) Attached hereto and marked as EXHIBIT 2 is an irrevocable performance guarantee  
12 dated March 4, 2010 signed by Geden Holdings, Ltd.  
13

14 3) Attached hereto and marked as EXHIBIT 3 is a diagrammatic representation of the  
15 holding structure organization of Advantage Tankers, LLC extracted from a loan agreement for  
16 the refinancing of one of its 100% owned vessels the ADANTAGE ARROW dated April 2, 2016  
17 with bank NORDDEUTSCHE LANDESBANK GIROCENTRALE.

18 4) Attached hereto and marked as EXHIBIT 4 is a document headed "Consent Letter",  
19 with Bates No.'s D01248 through D01252, produced in discovery by Advantage Tankers LLC in  
20 earlier litigation in the Southern District of Texas.  
21

22 5) Attached hereto and marked as EXHIBIT 5 is an extract from the deposition of Mr.  
23 Dave Chapman of Shell Oil Company, in which I examined the said deponent.

24 6) Attached hereto and marked as EXHIBIT 6 is manager's undertaking of Genel  
25 Denizcilik Nakliyatı, A.S. signed by its CFO Mehmet Mat as part of the loan agreement with  
26 Hayfin Bank for the acquisition/ financing of the vessels ADVANTAGE SPRING,  
27 ADVANTAGE SUMMER and ADVANTAGE SKY.  
28

1           7) Attached hereto and marked as EXHIBIT 7 is an extract from the loan agreement with  
2 the Hayfin Bank regarding the financing for the purchase of the vessels ADVANTAGE SPRING,  
3 ADVANTAGE SUMMER and ADVANTAGE SKY.

4           8) Attached hereto and marked as EXHIBIT 8 is a letter of Geden Holdings Ltd. dated  
5 March 4, 2010 signed by its Chief Executive Officer referring to the ownership of its one ship  
6 companies.

7           9) Attached hereto and marked as EXHIBIT 9 is a restructuring report dated March 6,  
8 2013, headed "Project Hermitage Restructuring" authored by AlixPartners UK LLP  
9 ("AlixPartners") regarding the reorganization of the Geden group of companies and their  
10 business.

11           10) Attached hereto and marked as EXHIBIT 10 is a multipage document obtained from  
12 the ship mortgage records of the Marshall Islands and it contains the following documents:  
13 "FIRST ADDENDUM TO FIRST PREFERRED MARSHALL ISLANDS MORTGAGE" dated  
14 31 January 2010; "AMENDMENT AND RESTATEMENT AND RELEASE AGREEMENT"  
15 dated January 7, 2020; "APPENDIX FORM OF AMENDED AND RESTATED FACILITY  
16 AGREEMENT (MARKED TO INDICATE AMENDMENTS)".

17           11) Attached hereto and marked as EXHIBIT 11 is a brief biographical sketch of Mr.  
18 Tobias Backer of Fleetscape, accessed online on June 19, 2010 at  
19 <http://forums.capitallink.com/shipping/2017NYmaritime/bios/backer.html> .

20           12) Attached hereto and marked as EXHIBIT 12 is email correspondence dated April 18,  
21 2013 from Mr. Backer to Mr. Mehmet Mat AT bates No. GH01009.

22           13) Attached hereto and marked as EXHIBIT 13 is email correspondence exchanged  
23 between Mehmet Mat and Mr. Backer in January 2014 and reproduced in documents with Bates  
24 No.'s GH 01278 -GH 01286.

1 Under the penalties of perjury, under the laws of the United States the above and  
2 foregoing is truthful and correct.

3  
4 Signed in Houston, Texas on this 19<sup>th</sup> day of June 2020.

5 Respectfully Submitted,

6 By:

  
George A. Gaitas